

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE: )  
 )  
ANDY LAMAR ALLMAN ) Bk. No. 17-03085-CW3-13  
639 Bonita Pky. ) Chapter 13  
Hendersonville, TN 37075 ) Judge Walker  
SSN: XXX-XX-8498 )  
 )  
Debtor(s). )

TRUSTEE'S JOINDER TO EXPEDITED MOTION OF CREDITOR INGE GOODSON TO CONVERT  
THIS CASE TO ONE UNDER CHAPTER 7 OF THE BANKRUPTCY CODE

Henry E. Hildebrand, III, Standing Trustee for Chapter 13 matters pending in the Middle District of Tennessee, by and through counsel, joins the Expedited Motion to Convert This Case to One Under Chapter 7 of the Bankruptcy Code ("Motion to Convert") filed by Inge Goodson and respectfully moves this Court for an Order converting the above-styled case to Chapter 7 for cause pursuant to 11 U.S.C. § 1307(c).

On May 3, 2017, the debtor filed a voluntary petition under Chapter 13 *pro se*. On May 22, 2017, the Trustee filed a Motion to Dismiss for Cause for Unreasonable Delay Prejudicial to Creditors ("Motion to Dismiss"). The debtor failed to file a Chapter 13 plan, Schedules, Statement of Financial Affairs, Form 22C, Matrix of Creditors, and a certificate of credit counseling. To date, the debtor has not filed these documents.

On June 16, 2017, Inge Goodson, a creditor and party in interest, filed the Motion to Convert. The Motion to Convert alleges that the debtor fraudulently conveyed property. Mr. Goodson also asserts that the debtor is ineligible for relief under Chapter 13, because he exceeds the debt limits, and the case was filed in bad faith. Contemporaneous with the filing of the Motion to Convert, Mr. Goodson filed an Objection to the Trustee's Motion to Dismiss requesting conversion based on the same grounds alleged by the Motion to Convert and opposing dismissal.

On June 19, 2017, the Court issued an Order setting a hearing on Mr. Goodson's Objection to the Trustee's Motion to Dismiss and the Motion to Convert for July 5, 2017 at 8:30 a.m.

The Trustee joins Mr. Goodson's Motion to Convert. Based upon information and belief, the debtor's estate may have assets including potential avoidance actions under 11 U.S.C. §§ 544, 547, or 549. Therefore, conversion to Chapter 7 would be in the best interest of creditors.

WHEREFORE, the premises considered, the Trustee joins the creditor's Motion to Convert and respectfully requests the Court convert the above-styled case to a case under Chapter 7 pursuant to 11 U.S.C. § 1307 for cause.

Respectfully submitted,

/s/ Margaret P. Reidy  
Margaret P. Reidy  
Counsel to the Chapter 13 Trustee

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on June 23, 2017, a true and correct copy of the attached was served in the following manner:

***By Electronic Case Noticing to:***

Ms. Beth R. Derrick, Assistant U.S. Trustee, 318 Customs House, 701 Broadway, Nashville, TN 37203;

***By U. S. Postal Service, postage prepaid to:***

Andy Lamar Allman, 639 Bonita Pky., Hendersonville, TN 37075

Steven L. Lefkovitz, 618 Church St., Suite 410, Nashville, TN 37219

Respectfully submitted,

/s/ Margaret P. Reidy

Margaret P. Reidy